

1 Andrew P. Holland/Bar No. 224737
2 aholland@thoits.com
3 Nathaniel H. Lipanovich/Bar No. 292283
4 nlipanovich@thoits.com
5 **THOITS LAW**
A Professional Corporation
400 Main Street, Suite 250
Los Altos, California 94022
Telephone: (650) 327-4200
Facsimile: (650) 325-5572

**7 Attorneys for Defendant
DSS Technology Management, Inc.**

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

INTEL CORPORATION ET AL.,

Case No. : 3:19-cv-07651-EMC

Plaintiffs,

V.

**FORTRESS INVESTMENT GROUP LLC,
ET AL.,**

Defendants.

**DECLARATION OF NATHANIEL H.
LIPANOVICH IN SUPPORT OF
JOINT STIPULATION AND
[PROPOSED] ORDER TO EXTEND
DEADLINE FOR DEFENDANT DSS
TECHNOLOGY MANAGEMENT,
INC. TO SEEK FEES AND COSTS**

18

19

20

21

22

23

24

25

26

27

28

1 I, Nathaniel H. Lipanovich, declare as follows:

2 1. I am an attorney licensed to practice law in all courts in the State of California and
3 am admitted to practice before the United States District Court, Northern District of California. I
4 am an associate in the law firm of Thoits Law, PC, and one of the attorneys responsible for the
5 representation of Defendant DSS Technology Management, Inc. ("DSS") in this matter. I make
6 this declaration of my own personal knowledge, unless the context indicates otherwise, and, if
7 called as a witness, I could and would testify competently to the facts stated herein.

8 2. The Court entered Judgment in this case on September 28, 2021. ECF No. 286.

9 3. DSS has indicated it will seek attorneys' fees and costs, including pursuant to a prior
10 settlement agreement between DSS and Intel Corporation ("Intel").

11 4. Pursuant to Federal Rule of Civil Procedure 54, the deadline for DSS to file a motion
12 or application for attorneys' fees and costs is currently October 12, 2021.

13 5. DSS and Intel seek an extension to this deadline to provide the parties additional time
14 to meet and confer pursuant to Local Rule 54-5.

15 6. This deadline has not been previously extended and the proposed extension will not
16 impact any other case deadlines, as the case is closed.

17 7. The Court previously modified other timing requirements in this case related to the
18 motions to dismiss filed by Defendants and the case management conference. These orders are
19 set forth at docket numbers 43, 75, 86, 124, 161, 196, 199, 232, 240, 250, and 262.

20 I declare under penalty of perjury under the laws of the United States of America that the
21 foregoing is true and correct, and that this Declaration was executed on the 8th day of October,
22 2021, at Santa Rosa, California.

23

24

By: /s/ Nathaniel Lipanovich

Nathaniel H. Lipanovich

25

26

27

28